

# HASSETT & DONNELLY

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**Paul Rainville**  
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September 15, 2014

EPA New England Headquarters  
5 Post Office Square - Suite 100  
Boston, MA 02109-3912

Re: Michael A. Commaroto, et al. vs. Pasquale Guzzo, AKA Pasqualino Guzzo d/b/a PDB  
Home Improvement, et al.  
Civil Action No.: FST-CV12-6013645-S

Dear Sir or Madam:

Please consider this a request under the Freedom of Information Act, 5 U.S.C. § 552 et seq.

Please be advised this office represents PDB Home Improvement in relation to an action currently pending in Connecticut Superior Court, Docket Number: FST-CV12-6013645S. The case involves the application of Spray Polyurethane Foam insulation into the home of Michael Commaroto.

It is our understanding that the EPA investigated and/or was given information relating to this incident.

As such, we request a copy of any and all materials relative to the application of Spray Polyurethane Foam to the home of Michael and Kimberly Commaroto, 15 Deer Park Meadow Road, Greenwich, CT, including but not limited to:

1. Any and all reports made by EPA agents or employees;
2. Any and all witness statements;
3. Any and all photographs related to this incident;
4. Any and all reports of tests and/or inspections made of 15 Deer Park Meadow Road, Greenwich, CT;
5. Any and all letters, emails, and other correspondence between Michael Commaroto and agents/employees of the EPA;

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(617) 892-6080

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(860) 247-0644

6. Any and all letters, emails, and other correspondence between Michael Commaroto and Mary Cushmac;
7. Any and all letters, emails, and other correspondence between Dr. Carrie Redlich and agents of the EPA relating to Michael Commaroto or 15 Deer Park Meadow Road, Greenwich, CT;
8. Any and all letters, emails, and other correspondence between Dr. Carrie Redlich and Mary Cushmac relating to Michael Commaroto or 15 Deer Park Meadow Road, Greenwich, CT;
9. Any and all hospital records of Michael or Kimberly Commaroto;
10. Any and all records of complaints relating to open-cell spray polyurethane foam insulation manufactured by Lapolla Industries.
11. Any and all records of testing conducted on open-cell spray polyurethane foam insulation manufactured by Lapolla Industries.

Please provide us, within twenty (20) business, days copies of all records requested above. Please let us know if there are any fees in connection with this request. If you cannot comply with this request, kindly provide an explanation in writing.

Should you require additional information, please do not hesitate to contact me. Thank you.

Very truly yours,



Paul S. Rainville

PSR/br